



Last Updated: May 27, 2020

Frequently Asked Questions regarding Federal grants and COVID-19

First Posted: April 7, 2020

Last Updated: May 27, 2020

This document is a list of frequently asked questions regarding the CARES Act's Elementary and Secondary Schools Emergency Relief (ESSER) fund grant and Every Student Succeeds Act (ESSA) federal entitlement grant programs in light of the COVID-19 pandemic. Districts should check this document frequently, as it will be updated with more FAQs as more guidance becomes available.

Contents

General Questions:	2
ESSER fund grant: Allocations (added 5/27/20)	4
ESSER fund grant: Allowable costs (added 5/27/20)	4
ESSER fund grant: Application/Availability of funds (added 5/27/20).....	6
ESSER fund grant: Eligibility (added 5/27/20).....	8
ESSER fund grant: Equitable Participation of Private Schools (added 5/27/20)	8
Title I, Part A:	12
Title II, Part A:	13
Title III, Part A:	14
Title IV, Part A:	14
ESSA Grants: Equitable Services	15

General Questions:**1. What information does MA DESE have on the Coronavirus Aid, Relief, and Economic Security (CARES) Act? (updated 5/5/20)**

The most significant funding for school districts under the CARES Act is the Elementary and Secondary School Emergency Relief Fund (ESSER Fund). ESSER funds are additional to the Elementary and Secondary Education Act (ESEA) Titles, Individuals with Disabilities Education Act (IDEA), and the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) allocations. Although ESSER fund distribution is determined by the proportion of Title I funds a district received in FY20, the funds may be used for any allowable purpose under the grant programs noted above. Please review the CARES Act [ESSER funds Quick Reference Guide](#). All ESSER-related resources are posted on our [website](#) and will be updated as more resources become available.

2. How will the ESSER funding for districts under the CARES Act be calculated and when can districts apply? (updated 5/27/20)

Approximately 43% of CARES Act funds are designated for the ESSER fund program, almost all of which will be allocated to states based on USED's proportional distribution of Title I funds. ESSER fund allocations to districts are based on the proportion of Massachusetts' Title I federal funding that a district received in FY20. This proportional allocation excludes closed charter schools, carryover funds, reallocated funds, School Improvement funds, Title I, Part D funds, and districts that declined FY20 funds. The ESSER fund grant application (fund code 113) is now available on DESE's Grants Management site, [here](#).

3. What is the obligation timeframe for the available use of ESSER funds? (added 5/5/20)

The ESSER application has two possible deadlines: Monday, June 15, 2020 and Wednesday, July 1, 2020. The reason for the two deadlines is to get the funding out the door to you as quickly as possible while abiding by State Procurement Laws. Please take note of this very important distinction. Districts that are seeking to charge any portion of allowable costs back to 3/13/20, must apply by the June 15, 2020 application deadline. Districts who do not expect to obligate any funds in FY20 (i.e., before July 1, 2020), but plan to begin using these funds in FY21, should apply by the 7/1/20 application deadline. ESSER Funds will initially be available for obligation through June, 2021, and are subject to the Tydings amendment, so may be carried forward into FY22 and, as necessary, the first quarter of FY23.

4. Due to school closures, might there be any modifications needed for the JAN-JUN Time and Effort reporting, such as including a statement regarding instructional support, planning, etc., while schools are closed? For Example, a Math Specialist is 100% paid from Title I and will continue to be paid as if classes were continuing.

Districts should continue using the same time and effort procedure they are currently using. District staff paid with federal funds must be accounted for on either a semi-annual or monthly certification form. We understand in many situations it will be difficult to obtain signatures on a timely basis. Please keep detailed records during this time and follow up with signatures when you can connect with your grant-funded employees. Districts should add a note to the records to document closure days.

5. Given the COVID-19 situation, we may not be able to encumber our federal entitlement grant funds as anticipated. Will an extension be granted? (updated 5/5/20)

The US Department of Education has granted Massachusetts the ability to extend the period of availability for FY19 Titles I, IIA, III, and IVA funds for an additional year. However, districts should attempt to expend all FY19 funds before expending any FY20 funds. If you need guidance on how you may do this, please contact your federal grant liaison. For FY20 Federal entitlement funds, ESSA and IDEA have carryover periods. Usually, districts complete a multi-year delegation form in EdGrants to carry over eligible, unclaimed funds to the next fiscal year. Due to the COVID-19 situation, DESE will submit multi-year delegation forms in EdGrants on behalf of districts. Beginning on 5/6/20, all FY19 and FY20 Title I, IIA, III, and IVA grants with an unclaimed balance over \$100 will be carried over and extended until to 9/30/21. All FY19 IDEA grants with a balance over \$100 will be extended to 9/30/20 and FY20 IDEA grants will be extended to 9/30/21. See the Grants Management [memo](#) and [slides](#) for details, posted [here](#).

6. What Federal entitlement grants are not eligible for the multi-year delegation?

The Perkins federal grant does not allow funds to be carried over at the district level.

7. Are we still able to draw down entitlement funds given school closures?

[EdGrants Front Office](#) can be accessed remotely as it is a web-based application. Grantees are encouraged to continue using EdGrants as needed. The payment request windows are set up at the start of the fiscal year so there will be no disruption in accessing payment windows. Payment windows remain open from the 20th of the month through the end of the month. Please see [additional guidance](#) from the office of Grants Management.

8. Our staff continues to work remotely during school closure. May we continue to pay their salaries under the Federal Grants?

Districts may continue to charge salaries and benefits to federal awards during school closure for those employees whose compensation has been budgeted under federal grants. Guidance from the US Office of Management and Budget (OMB) and US Department of Education (USED) authorizes Awarding agencies to allow recipients to continue charging salaries and benefits to applicable federal awards even in the event of school closures. (See response to question 4 above.)

ESSER fund grant: Allocations (added 5/27/20)

9. Have ESSER fund district allocations been released? Where can they be found?

District allocations and the complete RFP with application materials and guiding resources were posted on 5/8/20. Allocations and all application materials are located on the DESE Grants Management website at: <http://www.doe.mass.edu/grants/2021/113/>.

10. Will allocations be received in a lump sum or will a 10% initial payment be made like the other federal entitlement grants?

Once an ESSER fund application is approved by the federal grant program office, grants management will process the grant for initial payment of 10% of the grant's total allocation. Subsequent payments must be requested on a monthly basis as funds are obligated and expended.

ESSER fund grant: Allowable costs (added 5/27/20)

11. In general, how can ESSER funds be spent?

ESSER funds can support any allowable activity under the Every Student Succeeds Act (ESSA). This includes allowable activities under Titles IA, IIA, III, and IVA. In addition, ESSER funds may be used to pay for any allowable activity under the IDEA Act, the Perkins Career and Technical Education Act, the McKinney-Vento Homeless Assistance Act, and the Adult Education and Family Literacy Act. ESSER funds can also be used to pay for activities and supplies needed to prevent, prepare for, and respond to impacts of COVID-19. For more detail see ESSER resources at: <http://www.doe.mass.edu/federalgrants/esser/>.

12. Can ESSER funds be used to pay for technology? For all students or just Title I students or schools?

Technology is an allowable expense under Title IVA and Title I, so it is allowable for ESSER. All students and staff in the district can benefit from ESSER funds.

13. If ESSER funds are used for Title I allowable purposes, is use limited to Title I schools and Title I students in the district?

No. ESSER funds may be used to benefit any and all schools, staff, and students in the district, regardless of Title I status, even when used in Title I allowable ways.

14. Some students do not have access to Wi-Fi to engage in remote learning. Can we purchase Wi-Fi for them?

Bandwidth, hotspots, as well as other districtwide expenditures that facilitate online learning are allowable with ESSER Funds and fall under numerous categories of allowable spending. See, for example,

- Planning for and coordinating during long-term closures, including:
 - Providing technology for online learning to all students;
 - Purchase of educational technology (including hardware, software, and connectivity) for students who are served by the LEA that supports regular and substantive education interaction between students and their classroom instructors, including low-income students and students with disabilities (which may include assistive technology or adaptive equipment).

15. Is it possible to use these funds toward the purchase of a new curriculum with online platform components?

Yes, such an expenditure may be appropriate under numerous categories of ESSER Fund allowable activities, for example:

- Providing principals and other school leaders with the resources necessary to address the needs of their individual schools.
- Planning for and coordinating during long-term closures, including:
 - Ensuring other educational services can continue to be provided consistent with all Federal, State, and local requirements.

16. Would it be appropriate to use the funds to hire an additional School Nurse as part of a return to school plan?

Yes, such an expenditure may be appropriate under numerous allowable activities and expenditures, for example:

- As an allowable use under Title IV, or,
 - Developing and implementing procedures and systems to improve the preparedness and response efforts of LEAs.

17. Can ESSER funds be spent on teacher salaries or stipends?

Yes, as long as those salaries/stipends fall under one of the broad categories of allowable expenses under ESSER, you are encouraged to use them to maintain staffing levels.

18. Are bonuses an allowable expense?

Yes, as long as bonuses are related to COVID-19.

19. Are salaries subject to the MTRS 9% surcharge?

Yes. All federal grant funds are subject to the 9% surcharge for MTRS for salaries for those employees who belong to the MTRS.

20. Can we budget for indirect costs?

Yes, assuming the district has an approved restricted indirect cost rate at the time of submission.

21. Can we use the funds to pay for transportation for an after-school program for academic support?

Yes. This expenditure may fit under several categories of allowable expenditures, for example,

- Plan and implement activities related to summer learning and supplemental after school programs, including providing classroom instructor or online learning during the summer months and addressing the needs of:
 - Students living in poverty, Students with disabilities, English learners, Migrant students, Students experiencing homelessness, and/or Foster care youth

22. If we use ESSER funds for Special Education services, will those funds be counted towards our Maintenance of Effort (MOE) for IDEA (as if we had used local funds)?

No. MOE considers state/local funds only. ESSER funds are federal funds and will not be considered for calculating MOE for IDEA. See federal regulation 34 CFR sec. 300.23.

23. If we use ESSER funds for IDEA purposes, does this impact our circuit breaker reimbursement?

If the ESSER funds are used for a purpose that is reimbursable under circuit breaker, the district can still claim reimbursement.

24. We anticipate an increased need for legal services because of the differences in federal expectations with IDEA and how the state is advising us to proceed. Is that an allowable expense? And if so - how would it be categorized?

There is no express prohibition for using funds for legal services. You will have to review the categories of allowable activities/expenditures in light of your intended expenditure and be sure that it falls within an allowable activity/expenditure. Please reach out to your district liaison to discuss allowability of particular expenditures when in doubt.

ESSER fund grant: Application/Availability of funds (added 5/27/20)

25. Is there a requirement to consult with stakeholder groups (e.g., paraprofessionals, parents/guardians, community groups, etc.) like ESSA grants?

There is no express requirement to include stakeholders, but it is always a good idea to obtain stakeholder input.

26. On the signature page, we put our entire allotment, but how do we indicate that some is for FY20 and some is for FY21?

Enter your entire allocation on the signature page (and in the budget). ESSER funds will have a multi-year option. Those who opt to apply for FY20 funds, will get one initial payment of 10% of the award amount in July/August. DESE will then roll the balance of the grant into FY21 (Year 2) of the award (7/1/2020–6/30/2021).

27. I may have eligible expenses dating back to March 13th, but I am not sure at this time. Can I apply and submit for Option 2 (FY21) now and change it later to Option 1 (FY20)?

No. The application must be for either Option 1 (FY20) or Option 2 (FY21). If there is any doubt, use Option 1 so the start date allows for charging back to March 13th.

28. What is meant by 'charging back'?

As it relates to the ESSER fund grant, choosing the "Option 1" (FY20) deadline allows you to journal entry expenditures back to March 13th against the ESSER grant. This frees the funds that were originally charged for the expenditure that is allowable under the ESSER grant. The decision as to which option to choose should be made in collaboration with your school business administrator.

29. If we intend to obligate funds for FY20 costs but are not receiving the first payment until July or August, how will we be in compliance with closing out our FY20 budget?

Audit bases their compliance review on the allowability of funds, obligation date, and period of availability. Therefore, it is important that districts maintain all supporting documentation that shows the COVID-19 related allowable expenditures began from 3/13/20 on. You will have paid for allowable expenses going back to March 13, 2020 with current funds. Once your FY20 FC113 funds has been approved and disseminated, you will reimburse those expenditures with a journal entry to replace the funding used prior to receiving ESSER funds.

30. If I submit on June 15th for Option 2, my start date will be July 1st. If I submit on July 5th for Option 2 and it is substantially approvable, my start date will be July 5th?

That's correct. Your start date will be July 1st or the date on which we receive a substantially approvable application.

31. If I submit for FY21, should I wait until after June 15th to submit?

You do not have to wait until after June 15th to submit your FY21 application. You may submit it at any appoint before the July 1st deadline.

32. Do we have more than one year to expend ESSER funds?

Yes. The federal grant multi-year feature (known as the Tydings Provision) applies to this grant and therefore allows the grant to be extended into “Year 2” or “Year 3” as needed, making the maximum extension of the end date of this grant, 9/30/22.

33. Does receipt of ESSER funds impact calculation of amounts to be received from other federal grant or state funding sources?

No. The ESSER grant is a pandemic emergency appropriation separate from any other grant programs or funding calculations from other sources.

ESSER fund grant: Eligibility (added 5/27/20)

34. Are all schools in the district and all students/staff/families eligible to benefit from this grant or is it only available to Title I schools within the district?

ESSER funds are not Title I funds so their use is not limited to Title I schools or Title I students, even if used in Title I allowable ways. All schools, students, staff, and families in the district may benefit from use of ESSER grant funds.

35. Is this grant available to special education collaboratives?

No. This grant is made available to districts that received FY20 Title I, Part A funds. For those districts that were not Title IA eligible or declined FY20 Title IA funds, an allocation of at least \$20,000 was funded from the state administration reservation.

36. If you receive Title I funds but have implemented a furlough or lay off in this school year for a group of staff, does the district still qualify for ESSER funds?

You are not disqualified. In order to comply with the ESSER funding rules, however, the district needs to assure that it “will, to the greatest extent practicable, continue to compensate its employees and contractors during the period of any disruptions or closures related to COVID-19. In addition, each entity that accepts funds will continue to pay employees and contractors to the greatest extent practicable based on the unique financial circumstances of the entity.”

37. If we received a PPP loan does this impact the ESSER grant?

No. Receipt of COVID-related federal funding other than ESSER funding does not impact ESSER eligibility or amount of allocation.

ESSER fund grant: Equitable Participation of Private Schools (added 5/27/20)

38. What makes a private school eligible to participate in a district's ESSER grant?

All non-profit private schools that are located within a district are eligible to participate by obtaining their equitable share of ESSER grant resources from the district in which they are located.

39. Are private pre-schools eligible to participate?

Stand alone pre-schools are not eligible. Elementary and secondary private schools that include pre-schools are eligible to participate.

40. Are Neglected and Delinquent sites eligible to participate in a district's ESSER grant as private schools?

As long as a facility is considered a non-profit private elementary or secondary school that (A) is accredited, licensed, or otherwise operates in accordance with State law; and (B) was in existence prior to the date of the qualifying emergency (3/13/20) for the CARES Act programs and the school committee has approved them as such, they are eligible to participate in your ESSER grant and you should reach out to them and offer consultation about it. If they don't meet these conditions, then they are not eligible to participate according to the CARES Act.

41. Do equitable participation obligations apply to homeschools or just private schools?

Currently, home schools do not meet the ESSER definition of a non-profit private elementary or secondary school. The definition is very specific in the CARES Act. They must be (A) is accredited, licensed, or otherwise operates in accordance with State law; and (B) was in existence prior to the date of the qualifying emergency (3/13/20) for the CARES Act programs and the school committee has approved them as such.

42. If students from our district go to a private school in a neighboring town, another district, are we responsible to that private school to offer equitable participation in the ESSER grant?

No. All students enrolled (regardless of residence), staff, and families of students in schools located within your district are eligible to participate. Students that are residents of your district who are enrolled in private schools outside of your district's boundaries are not eligible to participate in your ESSER grant, and you have no obligation to consult with the schools they attend since they are not located in your district.

43. Our Title I grant is for elementary schools only. We were planning to reach out to the same group for ESSER grant participation. Do we now have to reach out to private high schools?

Yes. All private schools within your district (and all grades K-12 within them) are eligible for ESSER grant participation. If a private school within your district has a secondary school, then they are eligible to participate whether or not your district uses Title I funds at the high school level.

Although ESSER funds can be used for Title I allowable uses in both public and private schools, they are not Title I funds themselves and are not subject to Title I allowability rules.

44. Our private schools sometimes do not get back to us when we ask if they want to participate. Do we have to wait for responses before we apply?

Districts may ask for responses by a certain date as long as it is reasonable (which may be longer given school closures). Document all outreach efforts and retain return receipts for email or mail. If you have not heard back come application deadline, we advise that you include the K-12 enrollment for that school in the calculation of equitable share in the application private school form and budget. If the private school ultimately declines participation, your ESSER grant can be amended as needed.

45. Will the private school funds be automatically calculated within the ESSER application?

Yes. Once you supply enrollment for participating private schools, the application will generate a per pupil amount for all students (district and private school), as well as a total reservation for services for each participating private school and a total reservation for equitable services.

46. Is private school allocation based on total enrollment or just those students who reside in that particular town?

ESSER equitable share amounts are determined by total enrollment, K-12, in a participating school regardless of where enrolled private school students reside.

47. Should we ask the private school for their current enrollment or go with number stated under DESE's school and district profile?

Enrollment figures used to figure equitable share amounts for participating private schools should be from a time period similar to the enrollment figures used for public schools in the application, which is March 2020. Consult with the private school(s) to obtain an accurate enrollment figure.

48. Is it true then, that private schools won't be submitting a grant request directly?

Public school districts apply to DESE for the ESSER grant, not private schools. District applicants provide the opportunity for private schools located within their district boundaries to participate in an equitable share of the grant. Consultation between the district and participating private schools will determine equitable participation activities and budget detailed in the district's grant application.

49. So, districts just send participating private schools their share of grant funds?

No. The district must maintain control of the federal, public funds and the resources purchased with them at all times. This means that the district provides allowable services and resources paid with

the equitable share of funds to meet the assessed needs of participating private schools agreed through consultation.

50. Can equitable share funds be used to buy technology for use by participating private school students?

Yes. The district purchases the technology for the private school student and/or staff use and maintains title to the technology that it purchased with ESSER funding. The technology may be used by the private school students and/or staff for as long as needed for the program or project agreed to through consultation (i.e., distance learning during school closures). As long as purchases and services are secular, non-ideological, and serve to prevent, prepare for, and respond to impacts of the COVID-19 pandemic, any allowable expense under ESSER for districts is allowable for equitable participation of private schools.

51. Can allowable equitable participation purchases for participating private schools be charged as far back as March 13th?

Because districts must provide equitable services and cannot reimburse a private school for its expenditures, equitable services for private schools using ESSER funds can only be provided from the start date of the ESSER grant.

52. What if we want to apply using Option 2 (FY 21), but our participating private schools decide to use Option 1 (FY20)? Can we do this?

No. You, the applicant, must choose one option or the other. Which fiscal year option to use should be one of the consultation topics with participating private schools. Every effort should be made to accommodate needs of participating private schools, as allowable. After taking private school needs into consideration and accommodating them to the extent possible, final decision rests with the applicant public school district, which must provide its reasons for doing so in writing to the private school if it does not adopt the private school's requested option.

53. Are administrative costs calculated on the private school allocation, and is there a range that is considered "reasonable?"

A reasonable amount of a private school's equitable share can be utilized by the public school district to offset administrative costs of carrying out equitable service responsibilities. A reasonable amount could be in the range of 2%-5% of the equitable share.

54. What if a private school does not use the funds, and we carry over the grant into a second year, are equitable share funds forfeited?

Consultation on the use of equitable share funds should assume use of funds in the first school year. If all funds are not expended due to unforeseen circumstances, like ESSA grants, the equitable share will carryover over for private school uses in the next school year unless the private school declines further services.

55. Can we modify private school forms that we use for the ESSA grant outreach and consultation?

Yes, though a sample consultation outreach letter that covers both ESSER and ESSA participation is available on our website at <http://www.doe.mass.edu/federalgrants/esser/>. The Affirmation of Consultation form that is used for participating private schools is located on the same web page.

56. Assuming consultation will take place virtually, how do we obtain signatures on the Affirmation of Consultation form?

Signatures can be obtained by asking private school officials to sign the document and make a PDF or JPEG and send back to you.

The following sections are devoted to questions about existing ESSA funds (not about funding streams from the new CARES Act)

Title I, Part A:**57. We currently offer before/after school tutoring to students who qualify. These sessions were done face-to-face at school and in groups. Does DESE have any guidance/opinions about continuing with tutoring virtually or via another platform during school closures? (updated: 5/5/20)**

Please see Commissioner Riley's suggested guidelines set out in his March 26th [Remote Learning Recommendations During COVID-19 School Closures](#) and the April 24th [Updated Remote Learning Guidance](#) to district and school leaders. Regardless of the shape or form or vehicles used by your district and schools to meet the holistic and educational needs of your students and families, your Title I resources should be used to provide additional guidance and support for Title I eligible students to help ensure their well-being and success during school closure. All guidance and resources related to Learning at Home are being posted, [here](#).

58. We are ensuring access and accessibility to instruction for our Title I students at this point. Is there a specific district responsibility for maintaining the same level of targeted assistance instruction during this time of school closure? (updated: 5/5/20)

Unlike special education services, Title I service is supplemental and not required. Therefore, there is no specific requirement that a certain level of services be maintained. What's important now, however, is to provide students with guidance and support while schools are closed. Please see Commissioner Riley's suggested guidelines to school districts on [Remote Learning Recommendations During COVID-19 School Closures](#) and the April 24th [Updated Remote Learning Guidance](#). Title I resources should be used for allowable expenses in support of these recommendations to provide additional guidance and support for Title I eligible students to help ensure their well-being and success during school closure. Consult the [Grants Procedural Manual](#) for

guidance on when grant amendments are required. To amend your grant, contact your federal grants [liaison](#) to have the grant opened for amendment in EdGrants.

59. There are some students across the district that are in need of materials and supplies that aren't in Title I schools. Is it possible to use our funds to help support non-Title I schools?

Title I, Part A focuses on the concept of *eligible students*. Not all students in a district are eligible to participate in a program supported with Title I, Part A funds. Students enrolled in non-Title I schools are not eligible. Therefore, in this situation, the district cannot use Title I funds for this purpose in non-Title I schools and non-Title I students. Consider using Title IVA funding, which may be used to provide students with a well-rounded education.

60. Is there a ceiling amount for Title I Carryover funds and when is the request form due?

In the first year of the Title I grant, 85% of the grant should be expended. Under usual circumstances waivers of this limit are available for districts once every three years. Under the recently passed CARES Act, Massachusetts has been approved for a blanket waiver, which gives us and districts the ability to carry over more than 15% of their FY20 Title IA funds specifically for the 2020-2021 school year. (See answer to question 5 above.)

61. If our homeless students are experiencing new or more severe hardships, may we increase our reservation of Title IA funds for these needs?

Districts may review their TIA budget, and if they see an emergent need under the current situation to allot additional funds to the district's Title I homeless reservation, they are free to do so. Please file a budget amendment to reflect changes. Note that increasing this allocation may affect allocations to Title I eligible schools.

Title II, Part A:

62. We will likely provide our staff with virtual professional development for providing remote learning opportunities for students. Is this allowable under Title II, Part A?

Yes, virtual professional learning is an allowable cost under Title II, Part A.

63. Must virtual professional development meet the ESSA definition of high quality, sustained PD opportunities? (added 5/5/20)

No, DESE received a waiver of adherence to the ESSA definition of professional development. Normally, professional development activities supported with ESSA funds must, among other things, be sustained, intensive, and collaborative. With ED's waiver, districts may use federal grant funds to support shorter-term professional development as long as they are otherwise allowable under the relevant program.

Title III, Part A:

- 64. Some of our community-based organizations were wondering if we can provide parent literacy virtually. Some of the EL teachers have also asked if they can continue some afterschool programming through Zoom or Google Hangouts. Is this allowable with Title IIIA funds?**

Yes, this is an allowable use of Title IIIA funds.

- 65. Can a district use TIII funds to pay for a family communication platform to help EL families get easy-to-understand information about the rapidly changing educational environment during this crisis?**

Local funds should be used to support this service. If this is a challenge, consider using Title I funds, if these students are Title I eligible.

Title IV, Part A:

- 66. May Title IVA funds be used to purchase Wi-Fi hot spots, internet, etc.?**

Yes. Title IVA funds may be used for expenses related to distance learning if it is allowable and consistent with the purposes of at least one of the three content areas (in this case well rounded or effective use of technology), and if it is reasonable, necessary and allocable to the grant. Please note that the CARES Act waivers obtained from USED lift the 15% cap on expenditures for technology infrastructure for funds spent for Effective Use of Technology and lift the 20% expenditure requirements for the other two content areas for the 2019-2020 school year so that Title IVA funds can be used to best meet district needs.

- 67. I would like to allocate Title IVA funds to address these extraordinary COVID-19 circumstances by using these funds to support childcare of essential workers so they may protect the health and safety of students, staff, and our communities.**

Title IV-A funds may not be used for childcare expenses as it is not a regular activity of the district's educational program. It's possible that a district will be able to use money from the CARES Act funding stream if the expenditure fits within one of the allowable categories.

- 68. In Title IVA -- I know there is an up-to 15% qualifier on using these funds to support tech infrastructure and platforms. Might this be relaxed if funds need to be redirected for remote schooling?**

Under the recently passed CARES Act, Massachusetts applied and has been granted the ability to waive the 15% spending limit in Title IV, Part A to purchase technology infrastructure for FY2020 and any available FY2019 carryover funds. (See answer to question 18 above.)

ESSA Grants: Equitable Services**69. What is the district's responsibility regarding consultation for equitable participation considering the changes with COVID-19? (updated: 5/5/20)**

It is always the expectation that districts and private school officials are consulting with each other throughout the school year (20 USC 6320 and 7881). During this pandemic, the typical face-to-face meetings are likely unsafe; therefore, districts and private school officials should consider meeting virtually or over the telephone. Districts should attempt outreach to private school officials to share information about services that had been agreed to but are not feasible under current conditions, as well as possible alternatives now or in the future. Additionally, spring is when districts need to reach out to eligible private schools to offer consultation regarding participation in the next school year's grant programs. To the extent possible, continue to follow the [suggested timeline](#) for private school outreach.

It's important to note that funding from the CARES Act (ESSER Fund) is subject to equitable participation as well. Therefore, we recommend that districts and private schools engage in consultation from the perspective of identifying student needs, as there will potentially be various funding streams in the mix (i.e. FY19 carryover, FY20 carryover, FY21 ESSA funds, CARES Act funds). See the ESSER resources page for further guidance on equitable participation requirements.

70. Many private school services have been cancelled due to the pandemic, should we delay all private school services until next school year? (updated: 5/5/20)

Given that public and private schools are closed, services to private school students and staff may be disrupted. Additionally, some services may have been cancelled, and there may be changes to the types of services provided. Districts and private school officials should engage in consultation to assess the situation and determine a mutually agreeable plan. Unspent FY20 equitable share funds should be carried over for equitable services for participants in the 2020-21 school year.